

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	
CHARLES LITTLETON FRIDGE, III	§	Case No. 24-35056 (JPN)
	§	(Chapter 11)
Debtor.	§	

AMERICAN EXPRESS NATIONAL BANK,	§	
	§	
	§	
Plaintiff,	§	Adv. Pro. No. 25-_____
	§	
v.	§	
	§	
CHARLES LITTLETON FRIDGE III,	§	
	§	
Defendant.	§	

**RESPONSE TO ORIGINAL COMPLAINT OF AMERICAN EXPRESS
NATIONAL BANK TO DETERMINE DISCHARGEABILITY OF DEBT
[ECF 57]**

TO THE HONORABLE JEFFEREY P. NORMAN
U.S. BANKRUPTCY JUDGE:

COMES NOW, Debtor CHARLES LITTLETON FRIDGE III (the “Debtor”) and files this his Response to Original Complaint of American Express National Bank (the “Plaintiff”) to Determine Dischargeability of Debt and responds to the allegations in each corresponding paragraph of the Complaint as follows:

1. Debtor admits the allegations contained in Paragraph 1 of the Complaint
2. Debtor admits the allegations contained in Paragraph 2 of the Complaint.
3. Debtor admits the allegations contained in Paragraph 3 of the Complaint.
4. Debtor admits the allegations contained in Paragraph 4 of the Complaint.

5. Debtor admits the allegations contained in Paragraph 5 of the Complaint.

6. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 6 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

7. Debtor admits the allegations contained in Paragraph 7 of the Complaint.

8. Debtor admits the allegations contained in Paragraph 8 of the Complaint.

9. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 9 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

10. Debtor admits the allegations contained in Paragraph 10 of the Complaint.

11. In response to the allegations re-alleged and incorporated by the Plaintiff in Paragraphs 1 through 10 of the Complaint, Debtor re-alleges and incorporates his responses to all of the foregoing and ensuing allegations as if fully set forth herein at length.

12. Debtor denies the allegations contained in Paragraph 12 of the Complaint.

13. Debtor admits the allegations contained in Paragraph 13 of the Complaint.

14. Debtor admits the allegations contained in Paragraph 14 of the Complaint.

15. Debtor admits the allegations contained in Paragraph 15 of the Complaint.

16. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 16 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

17. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 17 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

18. Debtor admits the allegations contained in Paragraph 18 of the Complaint.

19. Debtor admits the allegations contained in Paragraph 19 of the Complaint.

20. Debtor admits the allegations contained in Paragraph 20 of the Complaint.

21. Debtor admits the allegations contained in Paragraph 21 of the Complaint.

22. Debtor admits the allegations contained in Paragraph 22 of the Complaint.

23. Debtor admits the allegations contained in Paragraph 23 of the Complaint.

24. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 24 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

25. Debtor admits the allegations contained in the first sentence of Paragraph 25 of the Complaint. Debtor is without sufficient information to either admit or deny the allegations contained in the second sentence of Paragraph 25 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

26. Debtor admits the allegations contained in Paragraph 26 of the Complaint.

27. Debtor admits the allegations contained in Paragraph 27 of the Complaint.

28. Debtor denies the allegations contained in Paragraph 28 of the Complaint.

29. Debtor denies the allegations contained in Paragraph 29 of the Complaint.

30. Debtor denies the allegations contained in Paragraph 30 of the Complaint.

31. Debtor denies the allegations contained in Paragraph 31 of the Complaint.

32. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 32 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

33. Debtor admits the allegations contained Paragraph 33 of the Complaint.

34. Debtor admits the allegations contained in the first clause of Paragraph 34 of the Complaint that he was a cardholder in good standing and had a great credit history with American Express and denies the remaining allegations.

35. Debtor denies the allegations contained in Paragraph 35 of the Complaint.

36. Debtor denies the allegations contained in Paragraph 36 of the Complaint.

37. Debtor denies the allegations contained in Paragraph 37 of the Complaint.

38. Debtor denies the allegations contained in Paragraph 38 of the Complaint.

39. Debtor denies the allegations contained in Paragraph 39 of the Complaint.

40. Debtor denies the allegations contained in Paragraph 40 of the Complaint.

41. Debtor denies the allegations contained in Paragraph 41 of the Complaint.

42. Debtor denies the allegations contained in Paragraph 42 of the Complaint.

43. In response to the allegations re-alleged and incorporated by the Plaintiff in Paragraphs 1 through 42 of the Complaint, Debtor re-alleges and incorporates his responses to all of the foregoing and ensuing allegations as if fully set forth herein at length.

44. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 44 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

45. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 45 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

46. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 46 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

47. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 47 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

48. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 48 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

49. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 49 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

50. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 50 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

51. Debtor admits the allegations contained Paragraph 51 of the Complaint.

52. Debtor admits the allegations contained Paragraph 52 of the Complaint.

53. Debtor admits the allegations contained Paragraph 53 of the Complaint.

54. Debtor admits the allegations contained Paragraph 54 of the Complaint.

55. Debtor admits the allegations contained Paragraph 55 of the Complaint.

56. Debtor admits the allegations contained Paragraph 56 of the Complaint.

57. Debtor admits the allegations contained Paragraph 57 of the Complaint.

58. Debtor is without sufficient information to either admit or deny the allegations contained in the second sentence of Paragraph 58 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

59. Debtor admits the allegations contained in the first sentence of Paragraph 59 of the Complaint. Debtor denies the allegations contained in the second sentence of Paragraph 59 of the Complaint.

60. Debtor admits the allegations contained in Paragraph 60 of the Complaint.

61. Debtor admits the allegations contained in Paragraph 61 of the Complaint.

62. Debtor denies the allegations contained in Paragraph 62 of the Complaint.

63. Debtor denies the allegations contained in Paragraph 63 of the Complaint.

64. Debtor denies the allegations contained in Paragraph 64 of the Complaint.

65. Debtor denies the allegations contained in Paragraph 65 of the Complaint.

66. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 66 of the Complaint. Therefore, for pleading purposes, those allegations are denied.

67. Debtor admits the allegations contained Paragraph 67 of the Complaint.

68. Debtor admits the allegations contained in the first clause of Paragraph 68 of the Complaint that he was a cardholder in good standing and had a great credit history with American Express and denies the remaining allegations.

69. Debtor denies the allegations contained in Paragraph 69 of the Complaint.

70. Debtor denies the allegations contained in Paragraph 70 of the Complaint.

71. Debtor denies the allegations contained in Paragraph 71 of the Complaint.

72. Debtor denies the allegations contained in Paragraph 72 of the Complaint.

73. Debtor denies the allegations contained in Paragraph 73 of the Complaint.

74. Debtor denies the allegations contained in Paragraph 74 of the Complaint.

75. Debtor denies the allegations contained in Paragraph 75 of the Complaint.

76. Debtor denies the allegations contained in Paragraph 76 of the Complaint.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that Plaintiff's claims be determined to be dischargeable.

Dated: March 12, 2025

Respectfully submitted,

FUQUA & ASSOCIATES, PC

BY: /s/ Richard L. Fuqua

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COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

This is to certify that on March 12, 2025, a copy of the above and foregoing instrument was forwarded by ECF, email and/or U.S. mail, first class postage prepaid to the parties listed below; and via ECF to all parties registered to received notice through the Court's ECF System.

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/s/ Richard L. Fuqua

Richard L. Fuqua